

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

TRIVEL, INC.

Plaintiff,

**Civil Action No. 2-25-cv-10190-SKD-CIv.
Hon. Susan K. DeClerq**

Tech Smart USA, Inc., et al.

Defendants.

**STIPULATION AND CONSENT MOTION TO REFER THIS CASE TO A
MAGISTRATE JUDGE FOR A SETTLEMENT CONFERENCE OR
MEDIATION**

NOW COME the parties, through counsel, and hereby stipulate and jointly move that this Court refer this matter to a U.S. Magistrate Judge (other than one who may hear discovery or other matters arising in this case) for a settlement conference pursuant to L.R. 16.6 or mediation pursuant to L.R. 16.4. The parties believe that such a process will facilitate settlement of this case and avoid the cost of further litigation.

Dated: April 9, 2025

Respectfully submitted,

/s/ Daniel M. Press
Daniel M. Press, Va. Bar No. 37123
dpress@chung-press.com
Chung & Press, P.C.
6718 Whittier Avenue/Suite 200
McLean, VA 22101
703-734-3800
703-734-0590 (fax)

/s/ Kurt O'Keefe
Kurt O'Keefe P30718
Local Counsel for Plaintiff
1254 Woodbridge Street
St. Clair Shores MI 48080
313-962-4630
koklaw@gmail.com

Counsel for Plaintiff

/s/ Marc Sackin
Marc Sackin
MORGAN STARR SACKIN, PLLC
Attorneys for Defendants
208 W. Park Street
Lapeer, MI 48446
(810) 664-9908
Email: msackin@starrsackin.com

Counsel for Defendants